File ICIB

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

VIA CERTIFIED MAIL - P730-169-906

December 13, 1989

Mr. Lee Heck
Johnson Controls, Inc.
1302 East Monroe Street
Goshen, Indiana 46526

Re: Notice of Deficiency
Container Storage Closure Plan
Johnson Controls, Inc.
Goshen, Indiana
IND 009549593

Dear Mr. Heck:

The Indiana Department of Environmental Management (IDEM) received your March 17, 1989, closure plan. Staff have reveiwed the closure plan for completeness and determined it to be inadequate pursuant to 329 IAC 3-21-3.

The attached Notice of Deficiency (NOD) outlines the specific deficiencies and provides discussion relevant to the revision. The information requested by the NOD must be submitted, in full, as an amended plan.

The amended plan must be received by this office within thirty (30) days of the date of receipt of this notice.

Enclosed are guidelines to assist you in preparing your closure plan.

If you have any questions, please contact Mr. Mitch Mosier at AC 317/232-3221.

Very truly yours,

Vic Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

MJM/dkp

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fayola Wright, U.S. EPA Region
Elkhart County Health Department
Mr. Randall H. Holliday

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NOTICE OF DEFICIENCY
CLOSURE PLAN REVIEW
JOHNSON CONTROLS, INC.
GOSHEN, INDIANA
IND 009549593

General Closure Deficiencies

1) Provide a site map drawn to scale (not more than 1" = 200') showing the facility and the location of the hazardous waste management units. North-South orientation must be specified.

2) Submit a plan view of the units, showing dimensions, appurtenant structures and relationship to other points or structures on the facility property. The scale of the drawing must be specified.

3) The facility must provide a complete detailed list of all hazardous wastes (chemical name and the U.S. EPA hazardous waste number) treated, stored or disposed of at each unit. Trade names or common names should not be used when generic chemical names are available. Provide the maximum inventory of wastes treated, stored or disposed of at each unit.

4) The facility must provide a detailed description of the steps needed to remove or decontaminate all hazardous wastes, residues, contaminated containment system components, equipment, structures and soils during closure. The description includes, but is not limited to, criteria for determining the extent of decontamination necessary to satisfy the closure performance standard, methods for sampling and testing surrounding soils, procedures for cleaning equipment to removing contaminated soils, and methods for properly disposing of contaminated wastes, residues, and soils. Sampling must specify a random sampling location, methodology, sampling and analytical methods, and a statistical method for comparing the data. All samples which are to be taken must be handled in accordance with 329 IAC 3-6. A copy of all laboratory QA/QC information must be included with the closure plan.

5) The plan should contain a timetable which shows all critical dates for closure, including waste removal, sampling, soil removal, critical points when the independent engineer or his representative will be present, restoration of the site, survey plat, if applicable, independent engineer's certification, and other relevant activities. This time table should generally start at the point of approval or some other definable date (i.e., aware of construction, etc.), and not rely on calendar dates.

6) Provide an up-to-date closure cost estimate, calculated to cover the cost of closure when the cost would be greatest. The closure cost estimate must be based on the costs of having a third party, neither a parent nor a subsidiary of the owner/operator, close the facility. The cost estimate must take into account the additional costs if extensive soil contamination is found. Provide a detailed cost estimate that includes a separate line for each activity or task performed during closure. Support line item estimates with calculations or subtotals based on unit prices, labor hours, equipment rental rates, disposal fees, and volume or quantity figures.

The closure cost estimate may not include the following:

-- Any salvage value that may be realized by the sale of hazardous wastes, facility structures, or equipment, land or other facility assets at the time of partial or final closure; and

-- A zero cost for hazardous waste that an owner or operator assumes a third party will take at no charge.

7) Provisions must be made for certification by the owner/operator and by an independent registered professional engineer that the facility was closed in accordance with the approved plan. Include a copy of the certification form to be used.

8) Provide a description of treatment or disposal methods at the final TSDF and provide the operating status of that facility (i.e., interim status or permitted facility). Also include the Environmental Protection Agency identification number of the final TSDF.

IC1B

Johns Controls, Inc.
Contr roducts Division
1302 East Monroe Street
Goshen, IN 46526-4297
Tel. 219/533-2111

MAR 21 2 40 PM '89

JOHNSON CONTROLS

March 17, 1989

Thomas E. Linson, Chief
Plan Review & Permit Section
Hazardous Waste Mgt. Branch
Solid & Hazardous Waste Mgt.

Dear Mr. Linson:

Please find enclosed Closure Plan from Treatment, Storage or Disposal Facility (TSDF) to a Large Quantity Generator for Johnson Controls, Inc., Control Products Division, 1302 East Monroe Street, Goshen, Indiana 46526-4197. EPA IND0095499593. Johnson Controls, Inc. manufacturer of measuring and controlling devices, environmental controls. Our hazardous waste management units are at the wastewater treatment area. For maps and diagrams of site and hazardous waste units see enclosures 1 and 2. You already have hydrogeologic and site geology. No secondary areas.

See Enclosure 3 for secondary containment.

We have at this time one (1) man that handles all solid and liquid waste. Waste from wastewater treatment (F006) 85% sludge is drummed, waste from spent Methylethyl Ketone, Xylene, Methyl Alcohol is in closed barrels, spent freon in closed barrels, used paint filters and booth scrapings in barrels. Stored in hazardous waste building used oil in 1500 gallon storage tank with 100 year flood plain.

Only units that will remain in use after closure will be in hazardous waste building, electroplating area, and wastewater treatment area.

Maximum inventory of waste see Enclosure 4.

Maximum extent of operations will remain the same.

All hazardous waste are on schedule to be removed at once and only waste here is less than 90 days old.